

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

GILBERT RODRIGUEZ and REFUGIO
CAMPOS, on Behalf of Themselves and All
Others Similarly Situated,
Plaintiffs

CIVIL ACTION NO. 5:13-cv-00020

v.

REPUBLIC SERVICES, INC., and BFI
WASTE SERVICES OF TEXAS, LP D/B/A
REPUBLIC SERVICES OF SAN
ANTONIO D/B/A ALLIED WASTE
SERVICES OF SAN ANTONIO
Defendant.

JURY TRIAL DEMANDED

UNSWORN DECLARATION OF GILBERT RODRIGUEZ

1. My name is Gilbert Rodriguez. I am above the age of 18 and competent to make this unsworn declaration. Except as otherwise indicated the following facts are within my personal knowledge and true and correct.

2. I am an individual and resident of San Antonio, Texas.

3. I worked as a residential garbage truck driver for the Defendants. My duties were the collection of residential waste.

4. I was often required to work on the weekends. These weekend hours are reflected in my pay stubs.

5. I was paid with a day rate during the week of \$120 plus a daily incentive of \$10. On the weekends I was not paid with a day rate, rather I was paid on an hourly basis.

6. I performed the same work on the weekend as I did during the week for Defendants. There was no distinction in duties, responsibilities, or obligations between the work

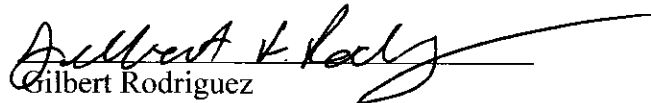
EXHIBIT B

I performed for the Defendants during the week and the work I was required to perform on the weekend.

7. Further, many other individuals worked with me as Residential Route Drivers. Each of those individuals was also paid in a combination of day rate and hourly rate. Each of those individuals also worked overtime on a regular basis. As Residential Route Drivers, each of those individuals performed the same kind of work.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 22, Oct, 2013.


Gilbert Rodriguez